

**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**FINAL POLLUTION REPORT**

DATE: May 26, 2000

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SUBJECT: Riverside Avenue Site, Newark,  
Essex County, New Jersey

POLREP NO.: One (01) and FINAL, ABANDONED TRAILER

**I. BACKGROUND**

Site No.:	PC
ERRS Contract No.:	68-S2-99-07 (WRS)
Delivery Order No.:	012
Response Authority:	CERCLA/SARA
NPL Status:	N/A
State Notification:	NJDEP Referral
Action Memorandum:	Approved on March 22, 2000
Start Date:	December 10, 1999
Completion Date:	March 2, 2000

**II. SITE INFORMATION**

**A. Incident Category**

CERCLA Incident Category: Abandoned Trailer containing hazardous wastes and substances

## B. Site Description

### 1. Site Description

The Riverside Avenue Trailer site was an abandoned trailer containing hazardous chemicals in severely corroded and leaking containers. The trailer was discovered at an active industrial park located at 29 Riverside Avenue, Newark, New Jersey, during an inspection conducted by the NJDEP on November 23, 1999. The trailer contained approximately 160 containers, in sizes ranging from a 55 gallon drum to a 5 gallon pail. The site location is in an active chemical industrial park containing about 6-8 different chemical manufacturing companies. None of the existing chemical companies, within the industrial park, have claimed any knowledge of the abandoned trailer.

The USEPA received a verbal request for assistance from the NJDEP on December 1, 1999 to conduct an emergency removal action at 29 Riverside Avenue, to mitigate the threats to human health and the environment posed by the severely corroded and leaking drums. The ERRD-RPB performed an expedited removal assessment (ERA) on December 2, 1999 and verbal authorization to conduct a removal action was granted by the ERRD Division Director on December 3, 1999. The ERRS contractor was subsequently issued a delivery order on December 10, 1999 and mobilization activities began later that same day.

### 2. Description of Threat

A threat to human health and the environment existed from the hazardous wastes and substances contained in the severely corroded and leaking containers. Many of the containers contained extremely hazardous chemicals, such as hydrofluoric acid, chromic acid, flammable liquids, oxidizers, peroxides, and caustic liquids to name a few. The threat of release was extremely high due to the condition of the containers and location within this heavily trafficked industrial park. The threat of release to the Passaic River was also of great concern due to the drums close proximity to the banks of the river (within 50 feet). Additionally, due to the poor condition of the containers and potential hazards within them, the potential for fire and explosion and release of toxic vapors was of great concern.

## III. RESPONSE INFORMATION

### A. Planned Removal Actions

The planned removal actions for this site will reduce the threat posed by the severely corroded and leaking drums. The major tasks which will be performed to achieve this objective are as follows: drum stabilization/overpacking (previously performed by the NJDEP), sampling and waste characterization (Hazcatting) of each container, sample bulking into waste compatible groups for off-site laboratory analyses, waste disposal solicitation, waste profiling and approval to the selected RCRA TSDF(s), and ultimate off-site transportation and disposal.

## B. Situation

### 1. Current Situation

All on-site activities, including demobilization of ERRS, were completed on March 2, 2000. The off-site shipment of 153 containers to a RCRA TSDF for intermediate storage was completed this same day. The waste manifests were accepted by the intermediate facility (CycleChem) on March 2<sup>nd</sup>, thereby marking the official completion date for this removal action. Executed copies of the manifests have been received for the entire shipment, however, certificates of destruction/disposal are pending ultimate disposal. When the intermediate RCRA TSDF (CycleChem, Elizabeth, NJ) accumulates enough containers for full truck load shipments to the ultimate RCRA TSDFs, the wastes will be transported and disposed of via incineration, fuel blending, or waste water treatment technologies.

### 2. Removal Actions to Date

The NJDEP performed the initial stabilization activities at the site during the time period November 23, 1999 through December 1, 1999. Stabilization activities included the removal and overpacking of each of the containers into appropriate salvage drums. The drums were subsequently staged in rows in front of an abandoned building owned by the City of Newark. Due to limited available space at this active chemical industrial park, the drums were placed in front of the abandoned building, in close proximity to a heavily utilized driveway and immediately adjacent to the Passaic River. Although this was not the best location attainable, the drums were temporarily stabilized and secured. Due to a lack of available funding, the NJDEP requested assistance from EPA in disposal and PRP case development. This request was received by the EPA on December 1<sup>st</sup> and an expedited removal assessment (ERA) was promptly performed on December 2<sup>nd</sup>. Based upon the conditions at the site and the types of hazardous chemicals involved, the RPB received a verbal authorization to proceed from the ERRD Division Director on December 3<sup>rd</sup>.

The OSC and ERRS mobilized to the site on December 10, 1999 for general site support activities (*i.e.* equipment and breathing air deliveries, site familiarization with OSC, etc.). Due to limited available space at the site and the expected short duration of the removal action, full scale support facilities were not deemed necessary (*i.e.* office trailer, electric and phone service, etc.).

ERRS mobilized the remaining manpower and equipment necessary to perform drum sampling on December 11<sup>th</sup>. Drum sampling by ERRS continued until December 13<sup>th</sup>. Each of the estimated 160 containers was sampled for hazard categorization ("Hazcatting") and subsequent disposal analyses. The OSC and a member from EPA's Division of Environmental Science and Assessment (DESA) performed the drum logging (documentation).

Since field chemists (from ERRS) were not available to perform the Hazcatting, the site OSC and other OSCs performed the Hazcatting under a ventilation hood in the Edison laboratory. A member from DESA also assisted in this task. As the samples were Hazcatted, the results were entered into the EPA DrumTrak program to assist in data management and development of waste compatible groups for disposal analyses.

During the second week of January 2000, ERRS remobilized to the Site to perform enforcement documentation of each overpacked drum. This task was accomplished by lifting each of the inner drums from their corresponding overpack containers, recording all marking and labeling information, and then obtaining photographs. All enforcement documentation of the overpacked drums was completed on January 10<sup>th</sup>. A member from DESA recorded all markings and labels and photographed each drum. Summary drum log sheets and photographs were provided. This information will be used in PRP case development.

On January 6<sup>th</sup>, bulk sample composites were made based on the compatibility test results. A total of twelve different sample groups were formed. Samples were shipped by the T&D coordinator to a private laboratory on January 7<sup>th</sup> for full disposal analyses.

The City of Newark Real Property Manager and OEM Coordinator granted permission to the EPA on January 7<sup>th</sup> to temporarily store the overpacked drums in a recently vacated building-Building #12 (The City of Newark had foreclosed on the Building #12 owners, and as a result, the vacated building was available for temporary drum storage). The ERRS contractor subsequently transferred the drums, by waste compatibility group, into Building #12 while awaiting approval for off site transportation and disposal.

Disposal analyses was received on January 26<sup>th</sup>. The OSCs promptly reviewed the analytical data and met with the WRS T&D Coordinator on the following day to scope out disposal options. The T&D coordinator prepared a disposal solicitation package and solicited bids from five different vendors. The bids were received on February 3<sup>rd</sup> and an award for off-site disposal was made within the next several days. Off-site disposal was tentatively scheduled for early March. Ultimate disposal will be provided via incineration, fuel blending, and/or wastewater treatment.

As part of the enforcement strategy to identify or determine PRPs, the OSCs began interviewing several of the chemical companies operating within this industrial park. Each of the active chemical companies were interviewed during the time period January 12<sup>th</sup> - January 28<sup>th</sup>. They were interviewed to determine the types of chemicals used within their individual operations and their knowledge of the abandoned trailer/contents. Each company interviewed denied any knowledge of the trailer or its contents.

Disposal bids were received on February 9<sup>th</sup>. A total of five different companies submitted bids. The bids were reviewed by the OSCs and the ERRS T&D coordinator, and an award was made on February 14<sup>th</sup> for off-site transportation and disposal to RCRA TSDFs in compliance with the CERCLA Off-Site Rule. Preparation of waste profiles and disposal acceptance was immediately initiated to expedite off-site disposal. Off-site shipment was tentatively scheduled for the week of February 28<sup>th</sup>.

Off-site shipment was initiated and completed on March 2<sup>nd</sup>. A total of 151 drums and 2-1yd<sup>3</sup> boxes, comprising twelve different wastestreams, were shipped off-site to RCRA TSDFs in compliance with the CERCLA Off-Site Rule. Ultimate disposal will be provided via incineration, fuels blending, and/or wastewater treatment.

Executed waste disposal manifests have been received from the intermediate RCRA TSDF. The wastes were received at this facility on the same day (March 2<sup>nd</sup>) as the initial shipment. March 2<sup>nd</sup> therefore signifies the completion date for this removal action since all other site activities were completed and the site was demobilized the same day.

### 3. Enforcement

Site files, which includes the photo documentation log, drum log identification sheets, and other pertinent information, has been forwarded to the EPA ORC attorney to assist in pursuing PRP identification and potential cost recovery actions. Information request 104(e) letters will be mailed to PRPs as they are identified. As of this date, no viable PRPs have been identified.

### C. Next Steps

The OSC, ORC and the RPB Technical Support Section will pursue identification of viable PRPs and ultimate cost recovery actions. At this time, no viable PRPs have been identified. Removal costs will be updated at a later date when those costs are received from the ERRS contractor and approved by the OSC.

### D. Key Issues

The manifests were signed and executed by the intermediate disposal transfer facility (CycleChem, Elizabeth, NJ) on March 2, 2000, marking the official completion date of this removal action.

## IV. COST INFORMATION

	<u>Amount Budgeted</u>	<u>Cost To Date</u>
ERRS (DCN#HE0015, WRS)	\$ 150,000	\$ 51,595
START	\$ -0-	\$ -0-
EPA Intramural (HQ and Region)	\$ 60,000	\$ 40,000(est)
Extramural Contingencies	\$ 40,000	\$ -0-
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TOTALS	\$ 250,000	\$ 91,595

Percent of Project Funds Remaining 58.8 %

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.



# V. DISPOSITION OF WASTES

WASTE STREAM	MEDIUM	QUANTITY	CONTAINMENT-MIGRATION CONTROL	TREATMENT	DISPOSAL
Acid liquids (D002, D008)	liquid	7 Drums	Drum	Wastewater treatment	Pending
Caustic flammable liquids (D001, D002)	liquid	4 Drums	Drum	Incineration	Pending
Organic peroxide (D001, D003)	liquid	1 Drum	Drum	Incineration	Pending
Non-RCRA liquids	liquid	16 Drums	Drum	Incineration	Pending
Hazardous waste solid (D008)	solid	12 drums	Drum	Incineration	Pending
Oxidizer liquid (hydrofluoric acid)	liquid	4 Drums	Drum	Incineration	Pending
Flammable liquids (D001, D018, F002)	liquid	26 Drums	Drum	Fuels blending	Pending
Chromic acid (D001, D007, D008)	solid	2 Drums	Drum	Incineration	Pending
Non-RCRA solids	solid	53 Drums	Drum	Incineration	Pending
Hazardous waste liquid (D009, D018, F002)	liquid	8 Drums	Drum	Incineration	Pending
Flammable liquid, toxic (D001, D043)	liquid	18 Drums	Drum	Incineration	Pending